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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Oct 21, 2020

SEAN F. MCAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LANCE HORNTVEDT,
15 ERIC CHRISTIAN,
16 ALYSSA CANTU,
17 ALEJANDRO LEON,
18 JOEL CERVANTES,
19 TIFFANIE SANDERS,
20 MARILOU MARTINEZ, and
21 GIOVANNI KINSEY,

22 Defendants.

4:20-CR-6029-SAB

INDICTMENT

Vio: 18 U.S.C. § 371

Conspiracy to Provide Prohibited
Objects to an Inmate of a Prison
(Count 1)

18 U.S.C. § 1791(a)(1), (b)(1),
(b)(2), (b)(3), (b)(4), (c)
Attempt to Provide Prohibited
Objects to an Inmate of a Prison
(Count 2)

18 U.S.C. § 1791(a)(2), (b)(1), (c)
Inmate in Possession of a
Prohibited Object
(Count 3)

18 U.S.C. § 1791(a)(1), (b)(4)
Providing a Prohibited Object to
an Inmate of a Prison
(Count 4, 6)

18 U.S.C. § 1791(a)(2), (b)(4), (c)
Inmate in Possession of a
Prohibited Object
(Count 5, 9)

18 U.S.C. § 1791(a)(2), (b)(3), (c)
Inmate in Possession of a
Prohibited Object
(Count 7, 8)

The Grand Jury charges:

GENERAL ALLEGATIONS

1. At all times relevant to this Indictment, the Benton County Jail was a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General. The Benton County Jail is located in the Eastern District of Washington in Benton County, Washington.

2. At all time relevant to this Indictment, Defendant ERIC CHRISTIAN was a Benton County Jail Corrections Officer.

3. At all times relevant to this Indictment, inmates of the Benton County Jail were prohibited from possessing and using cellular telephones and controlled substances, including: methamphetamine, heroin, buprenorphine (Suboxone), and marijuana.

4. At all times relevant to this Indictment, Defendants LANCE HORNTVEDT, ALEJANDRO LEON, JOEL CERVANTES, and GIOVANNI KINSEY were inmates of the Benton County Jail.

5. At all times relevant to this Indictment, Defendants ALYSSA CANTU, TIFFANIE SANDERS, and MARILOU MARTINEZ were not inmates of the Benton County Jail and were not otherwise in custody.

6. The object of the conspiracy was for the Defendants to introduce cellular telephones and controlled substances, including: methamphetamine, heroin, buprenorphine (Suboxone), and marijuana into the Benton County Jail.

7. Beginning on a date unknown, but by December 2019, and continuing until on or about April 21, 2020, in furtherance of the conspiracy and to effect the

1 objects thereof, Defendant LANCE HORNTVEDT utilized cellular telephones, jail
2 communications and text applications to facilitate, communicate, instruct, direct,
3 and order Defendants ALYSSA CANTU, TIFFANIE SANDERS, and MARILOU
4 MARTINEZ to provide Defendant ERIC CHRISTIAN with cellular telephones
5 and controlled substances, to wit, methamphetamine, heroin, buprenorphine
6 (Suboxone), and marijuana. Defendant ERIC CHRISTIAN in turn provided the
7 cellular telephones and controlled substances, to wit, methamphetamine, heroin,
8 buprenorphine (Suboxone), and marijuana, to Defendant LANCE HORNTVEDT
9 in the Benton County Jail. Defendant LANCE HORNTVEDT then further
10 distributed the cellular telephones and controlled substances, to wit,
11 methamphetamine, heroin, buprenorphine (Suboxone), and marijuana, to
12 ALEJANDRO LEON, JOEL CERVANTES, and GIOVANNI KINSEY.
13 Defendant LANCE HORNTVEDT also retained and used some of the cellular
14 telephones and controlled substances, to wit, methamphetamine, heroin,
15 buprenorphine (Suboxone), and marijuana, for his own use.
16

17 COUNT 1

18 8. The Grand Jury repeats and realleges Paragraphs 1 through 5 of this
19 Indictment as if fully set forth herein.

20 9. Beginning on a date unknown, but by December 2019, and continuing
21 until on or about April 21, 2020, in the Eastern District of Washington, the
22 Defendants, LANCE HORNTVEDT, ERIC CHRISTIAN, ALYSSA CANTU,
23 ALEJANDRO LEON, JOEL CERVANTES, TIFFANIE SANDERS, MARILOU
24 MARTINEZ and GIOVANNI KINSEY, did knowingly and intentionally combine,
25 conspire, confederate and agree together with each other and with other persons,
26 both known and unknown, to commit the following offense against the United
27 States to wit: possessing and providing prohibited objects as defined by 18 U.S.C.
28 § 1791(d)(1), (A), (B), (C) and (F) to inmates at the Benton County Jail, a facility

1 in which persons are held in custody by direction of and pursuant to a contract and
2 agreement with the Attorney General, to wit: controlled substances, including:
3 methamphetamine, heroin, buprenorphine (Suboxone), marijuana and cellular
4 telephones, in violation of 18 U.S.C. § 1791(a)(1), (a)(2), (b)(1), (b)(2) (b)(3),
5 (b)(4) and (c), all in violation of 18 U.S.C. § 371.

6 Object of the Conspiracy

7 10. The Grand Jury repeats and realleges Paragraph 6 of this Indictment
8 as if fully set forth herein.

9 Manner and Means

10 11. The Grand Jury repeats and realleges Paragraph 7 of this Indictment
11 as if fully set forth herein.

12 Overt Acts

13 12. In furtherance of said conspiracy and to effect the object thereof, the
14 Defendants and their co-conspirators committed the acts set forth in Count 2
15 through Count 9 as set forth below.

16 13. All of which is in violation of U.S.C. § 18 U.S.C. § 371.

17 COUNT 2

18 14. Beginning on a date unknown, but by December 8, 2019, and
19 continuing until on or about April 21, 2020, the Defendants, ERIC CHRISTIAN,
20 ALYSSA CANTU, MARILLOU MARTINEZ and TIFFANIE SANDERS,
21 attempted to provide prohibited objects defined by 18 U.S.C. § 1791(d)(1)(A), (B),
22 (C), (F), to wit: controlled substances, including: methamphetamine, heroin,
23 buprenorphine (Suboxone), marijuana and cellular phones, to an inmate at the
24 Benton County Jail, a facility in which persons are held in custody by direction of
25 and pursuant to a contract and agreement with the Attorney General, in violation of
26 18 U.S.C. § 1791(a)(1), (b)(1), (b)(2), (b)(3), (b)(4) and (c).
27
28

COUNT 3

15. On or about January 29, 2020, in the Eastern District of Washington, the Defendant, GIOVANNI KINSEY, an inmate of Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General, possessed and attempted to possess a prohibited object, to wit a narcotic drug, methamphetamine, as defined by 18 U.S.C. § 1791(d)(1)(C), in violation of 18 U.S.C. § 1791(a)(2), (b)(1) and (c).

COUNT 4

16. On or between December 12, 2019 and February 2, 2020, in the Eastern District of Washington, the Defendants, ERIC CHRISTIAN and TIFFANIE SANDERS, provided a prohibited object, to wit a cellular telephone as defined by 18 U.S.C. § 1791(d)(1)(F) further described as a black LG smart phone model number, LML212VL, International Mobile Equipment Identity (IMEI) number as 355987109283621, Serial number: 911VTYK1931362, to LANCE HORNTVEDT, an inmate at the Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General, in violation of 18 U.S.C. § 1791(a)(1) and (b)(4).

COUNT 5

17. On or about February 2, 2020, in the Eastern District of Washington, the Defendant, LANCE HORNTVEDT, an inmate of Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General possessed or attempted to possess a prohibited object, to wit a cellular telephone as defined by 18 U.S.C. § 1791(d)(1)(F) further described as a black LG smart phone model number, LML212VL, International Mobile Equipment Identity (IMEI) number as 355987109283621, Serial number: 911VTYK1931362, in violation of 18 U.S.C. § 1791(a)(2), (b)(4) and (c).

COUNT 6

18. On or between February 24, 2020 and April 21, 2020, in the Eastern District of Washington, the Defendants, ERIC CHRISTIAN and ALYSSA CANTU provided a prohibited object, to wit a cellular telephone as defined by 18 U.S.C. § 1791(d)(1)(F) further described as a black LG cellular phone bearing IMEI:353566111505544, to ALEJANDRO LEON, an inmate at the Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General, in violation of 18 U.S.C. § 1791(a)(1) and (b)(4).

COUNT 7

19. On or about February 28, 2020, in the Eastern District of Washington, the Defendant, ALEJANDRO LEON, an inmate of Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General possessed and attempted to possess a prohibited object, to wit, marijuana as defined by 18 U.S.C. § 1791(d)(1)(B), in violation of 18 U.S.C. § 1791(a)(2), (b)(3) and (c).

COUNT 8

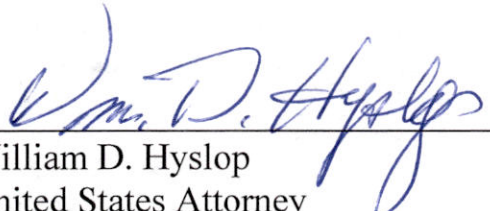
20. On or about February 28, 2020, in the Eastern District of Washington, the Defendant, JOEL CERVANTES, an inmate of Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General possessed a prohibited object, to wit, buprenorphine (Suboxone) as defined by 18 U.S.C. § 1791(d)(1)(B), in violation of 18 U.S.C. § 1791(a)(2), (b)(3) and (c).

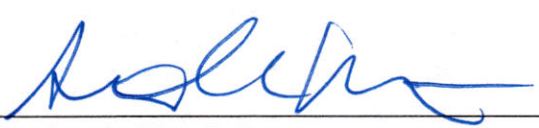
COUNT 9

21. On or about April 21, 2020, in the Eastern District of Washington, the Defendant, ALEJANDRO LEON, an inmate of Benton County Jail, a facility in which persons are held in custody by direction of and pursuant to a contract and

1 agreement with the Attorney General possessed and attempted to possess a
2 prohibited object, to wit a cellular telephone as defined by 18 U.S.C.
3 § 1791(d)(1)(F) further described as a black LG cellular phone bearing IMEI:
4 353566111505544, in violation of 18 U.S.C. § 1791(a)(2), (b)(4) and (c).

5 DATED this 20 day of October 2020.
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